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14 Medical Center, LLC*

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE DISTRICT OF NEVADA**

17 LAKISHA LEWIS,

18 Plaintiff,

19 vs.

20 SUNRISE HOSPITAL AND MEDICAL
21 CENTER, LLC, a Delaware Limited Liability
22 Company; DOES I-X; and, ROE Business
23 Entities I-X,

24 Defendants.

25 Case No.: 2:21-cv-00464-CDS-VCF

26 **STIPULATION AND ORDER TO
27 EXTEND DISPOSITIVE MOTIONS
28 AND RESPONSES THERETO**

29 **(SPECIAL REVIEW REQUESTED
30 (FIRST REQUEST)**

31 Plaintiff Lakisha Lewis (“Plaintiff”) and Defendant Sunrise Hospital and Medical Center,
32 LLC (“Defendant”) (collectively, when possible, “the Parties”), by and through their respective
33 counsel, hereby stipulate and agree to extend the time for the Parties to file dispositive motions in
34 this action. Pursuant to the Court’s Order of May 31, 2022 Order (ECF 24), the current deadline for
35 filing dispositive motions is Monday, September 12, 2022. Having taken the deposition of Plaintiff
36 Lakisha Lewis on August 15, 2022, the parties have completed all discovery in this case. Good cause
37 exists for the proposed extension of time to file and respond to dispositive motions. The Parties
38 previously filed three requests to extend discovery deadlines and this is the Parties’ first request to
39 extend the dispositive motion deadline.

1 **I. REASONS TO EXTEND THE DISPOSITIVE MOTION DEADLINE**

2 The extension is necessary, given the current briefing schedule for dispositive motions. The
3 Parties conducted the deposition of Plaintiff Lakisha Lewis on August 15, 2022. The Plaintiff has
4 thirty (30) days from the date of receipt of her deposition transcript to review and make any changes
5 to the transcript. Currently, the deadline to file dispositive motions is September 12, 2022. This will
6 leave little, to perhaps no time to incorporate Plaintiff's deposition testimony into dispositive
7 motions. Taking the time for deposition transcript preparation, and the review of said deposition
8 transcript into account, the Parties have agreed to extend the dispositive motion deadline and have
9 agreed to a proposed briefing schedule:

10 Based on the foregoing, the Parties have agreed that the dispositive motion deadlines should
11 be extended in the following manner:

12 • Defendant shall file its dispositive motion no later than **Monday, December 12, 2022**;
13 • Plaintiff will file her opposition no later than **Wednesday, January 11, 2023**; and
14 • Defendant shall file its reply no later than **Friday, February 10, 2023**.

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1 **IT IS SO STIPULATED.**

2 DATED this 23rd day of August, 2022.

DATED this 23rd day of August, 2022.

3 KEMP & KEMP, ATTORNEYS AT LAW

4 OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

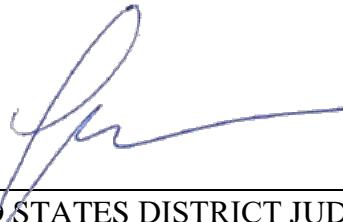
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14 **ORDER**

15 
16 UNITED STATES DISTRICT JUDGE

17 August 23, 2022

18 DATE